DECLARATION OF GUIDO BRUSA UNDER 37 C.F.R. § 1.132

I, Guido Brusa, declare that:

1. I am a shareholder of ALLORA International, LLC, the assignee of U.S Serial Patent Application No. 10/728,716 ("the '716 application);
2. I have over twenty years of experience related to fluid valves, fluid piping systems and related hardware and fittings;
3. I am familiar with the subject matter of the '716 application and have dealt extensively with the development of the subject matter of the '716 application;
4. In developing the subject matter of the '716 application, the focus was to develop a fluid valve that could be universally used with several different types of fittings common to the industry, such as sweat fittings, press on fittings, or crimp fittings;
5. Development of the '716 application subject matter was also directed towards providing a single-piece construction valve, which would improve efficiency and reduce costs when installing the valve;
6. Development of the invention covered by the '716 application was also directed towards providing a valve that would be more easily and efficiently serviced compared to previous valves used in fluid systems;
7. Neither I nor anyone I was associated with in the industry knew of any universal, single-piece construction fluid valve before the valve of the '716 application was invented and developed;
8. I have thoroughly reviewed and am familiar with the prior art cited in the '716 application;
9. I have noted the following differences between the cited prior art and the '716 application, specifically between U.S Pat. No. 6,467,752 to Woods ("Woods") and U.S. Pat. No. 3,596,939 to Gibson ("Gibson");
10. Woods does not include several of the features of the claimed invention of the '716 application. For instance;
    a. The Woods valve is not a "one piece construction" valve as clearly defined in Fig. 1 of the Woods patent. The ballcock/ball-valve valve generally designated as 30 comprises various components. In fact, the generally designated ball valve 10 is described as an assembly of various components such as a housing body 12, which incorporate two (2) flanges 14 held together by various studs and respective nuts (not numbered);
    b. The Woods valve does not have male couplings adaptable to any type of connection currently in the market. Woods valve is a <u>single purpose</u> valve which operates by having a pipe 28 being inserted inside the female housing12 and having the sleeve (thread-less fitting) 18 forced by an hydraulic tool over the portion 16 of housing12 which incorporate a combination female interior portion that comes in contact with the pipe 28 and an exterior portion which is deformed by sleeve 18;
    c. The Woods valve has female reception and it can <u>only</u> accept pipe or tubing 28;

d. Much differently, the valve in the '716 application is a valve equipped with male tubular couplings 7 and 8 made in a single construction integrated in the valve body 2. This configuration allows for universally connecting the '716 valve to any style fittings, and even when a crimp style fitting is selected, thus substantially deforming the annealed couplings 7 and 8, the valve is able to maintain its integrity;

11. Gibson also does not include several features of the claimed invention and does not make up for the above limitations of the Woods patent; For instance,
    a. Most significantly, Gibson, in fact, is not a valve. Gibson is a crimpable fitting designed to join various sections of metallic tubing (conduit);
    b. Gibson only describes a connector for various sections of piping;
    c. The fittings described in Gibson do not suggest the valve of the '716 application; in fact, if nothing else, Gibson reinforces the validity of the invention of the '716 application since the '716 valve could be utilized with Gibson's fittings as the female fitting could be inserted over the '716 valve male coupling as one of the way the '716 valve could be connected to a conduit;
12. The valve of the '716 application is a valve (as demonstrated in the attached brochure) of a universal designed which can be utilized in applications where standard sweat fittings are utilized, or press on fitting, or crimp fittings;
    a. The Woods valve is a single purpose valve which it can be utilized only by connecting a pipe or tubing 28 to the housing 12;
    b. The Gibson fitting is not a valve;
13. I have also reviewed other relevant prior art, including Giacomini US Patent No. 6,296,229 ("Giacomini"), which is dissimilar to the '716 valve. For instance;
    a. Giacomini is a metal ball valve designated specifically for gas applications (column 1, lines12-14);
    b. The Giacomini valve is a valve which requires additional fittings in order to being incorporated in a system. This is a very conventional way valves are connected to piping system in a circuit;
    c. Conversely, the valve of the '716 application offers substantial cost saving by eliminating the need of an additional fitting, eliminating the labor to install such fitting, and eliminating an additional joint thus eliminating an additional place where leaks can potentially develop;
    d. The valve of the '716 application has a universal design that allows the valve to be used not only for gas applications but also for potable water, compressed air and with their stainless still version also it can be utilized for oxygen as required in many medical applications;
14. The claimed invention of the '716 application is a distinct, novel valve not previously known in the fluid industry, and has received great commercial success;
15. In my experience in the industry, I have not seen a valve that is as universally adaptable as the present valve covered by the invention of the '716 application;
16. I declare further that all statements made in this Declaration are of my own knowledge and are true and that all statements made on information and belief are believed to be true and further that theses statements were made with the

knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under section 1001 of Title 18 of the United States Code and that such willful false statements may jeopardize the validity of the '716 application and any further reissue patents issuing therefrom.

BY:_____ DATE: September 13, 2006

Guido Brusa
Shareholder
ALLORA International, LLC.